

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF C. BRETT VAUGHN IN SUPPORT OF
PLAINTIFFS' DAUBERT MOTION TO PRECLUDE OPINIONS OF
DEFENSE EXPERT MICHAEL B. BOTTORFF, PHARM. D.**

C. BRETT VAUGHN, hereby certifies as follows:

1. I am an attorney at law within the State of Kansas with Nigh Goldenberg Raso & Vaughn, PLLC, and serve on the Plaintiffs' Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion to exclude the testimony of Michael B. Bottorff, Pharm. D.

2. Attached hereto as **Exhibit A** is a true and accurate copy of the 8/2/2021 Expert Report of Michael Bottorff.

3. Attached hereto as **Exhibit B** is a true and accurate copy of 1/12/2022 Expert Report of Michael Bottorff.

4. Attached hereto as **Exhibit C** is a true and accurate copy of the 3/25/2022 Deposition Transcript of Michael Bottorff.

5. Attached hereto as **Exhibit D** is a true and accurate copy of the 9/16/2021 Deposition Transcript of Michael Bottorff.

NIGH GOLDBERG RASO VAUGHN, PLLC
Attorneys for Plaintiffs

Dated: March 13, 2023

By: /s/ C. Brett Vaughn
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